

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

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| LA UNIÓN DEL PUEBLO ENTERO, <i>et al.</i> , | § | |
| <i>Plaintiffs,</i> | § | |
| | § | |
| v. | § | Case No. 5:21-cv-844-XR |
| | § | |
| GREGORY W. ABBOTT, <i>et al.</i> , | § | |
| <i>Defendants.</i> | § | |

DECLARATION OF JONATHAN WHITE

I, Jonathan White, pursuant to 28 U.S.C. 1746, am executing this declaration. I declare under penalty of perjury that the facts stated below are true and correct to the best of my personal knowledge and belief.

1. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration. The evidence set out in the foregoing Declaration is based on my personal knowledge and experience.
2. I have been deposed twice in the above-captioned case, on April 27, 2022, in my personal capacity, and on May 5, 2022, as a 30(b)(6) witness for the Office of the Attorney General of Texas.
3. At those depositions, based on investigative privilege, I declined to answer certain questions regarding non-public information related to active and ongoing criminal investigations. I also declined to answer questions regarding certain internal, predecisional discussions within the Attorney General's office which implicated the Deliberative Process Privilege.
4. I provided fulsome testimony at those depositions regarding closed criminal investigations, as well as general details regarding the agency's investigative process, based on my 15 years of criminal investigative experience at the Attorney General's office, including in my former position of Division Chief of the Election Integrity Division.



5. I have also provided a Declaration, dated June 22, 2023, in the above-mentioned case. That Declaration does not include any privileged information.
6. The statements in Paragraphs 18 through 23 of my June 22, 2023, Declaration relate to my understanding of ballot harvesting, gaining through my years of criminal investigative experience. As an illustration, I mentioned the ongoing criminal matter of Zul Mohamed, a mayoral candidate in Carrollton, Texas, who was arrested by the Denton County Sheriff's Office on suspicion of mail ballot fraud. The Attorney General's office was one of several law enforcement organizations that participated in the investigation of Mr. Mohamed. Mr. Mohamed's prosecution is being handled by the Denton County District Attorney's office. To the best of my knowledge, all the factual assertions in these Paragraphs regarding Mr. Mohamed's case consist of public information contained in the search warrant and affidavit filed in Denton County, court filings, county public election records, and/or in public statements by local officials in Dallas, Denton, and Collin counties, which have been cited widely in media articles.
7. The remaining cases referenced in my June 22, 2023, Declaration all relate to closed criminal matters.

Executed on July 14, 2023.

/s/ Jonathan White
(signed by Zachary Berg with permission of
Jonathan White)

Jonathan White
Former Division Chief
Election Integrity Division
Office of the Attorney General of Texas